



February 18, 2009

Reply to Attn of:

140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Determination Regarding Attendance of NASA Employees at Reception
and Buffet Sponsored by Associated Universities Inc.

Associated Universities Inc. (AUI) is hosting a reception and buffet on Thursday, February 19, 2009, at the Madison Hotel in Washington, D.C. AUI is an educational institution dedicated to research, development, and education in the physical, biological and engineering sciences. It is chartered to acquire, plan, construct and operate laboratories and other facilities for use by universities, other research organizations, and the Federal Government. Among other facilities, AUI operates the National Radio Astronomy Observatory for the National Science Foundation. Approximately 90 guests are expected to attend the event, including individuals from universities, industry, research organizations, Federal agencies, and congressional staffers. The cost for the reception and buffet is estimated to be approximately \$50.00 per person.

Attendance at the reception will allow NASA employees an opportunity to discuss with other guests issues concerning NASA's science missions.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event. Accordingly, NASA employees whose duties do not substantially affect AUI may accept an invitation for free attendance to the dinner for themselves and their spouses or guests.

NASA employees whose duties substantially affect AUI, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in dark ink, appearing to read "Robert M. Stephens", with a long, sweeping horizontal line extending to the right.

Robert M. Stephens